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October 12, 2005

*Via Federal Express*

**Delphi Corporation, et al., c/o**

John William Butler, Esq.  
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333 W. Wacker Drive, Suite 2100  
Chicago, IL 60606

Kayalyn A. Marafioti, Esq.  
Skadden, Arps, Slate, Meagher & Flom, LLP  
Four Times Square  
New York, NY 10036

RE: Gibbs Die Casting Corporation v. Delphi Corporation, et al.

Dear Mr. Butler and Ms. Marafioti:

Our law firm represents Gibbs Die Casting Corporation ("Gibbs") and it has come to the attention of Gibbs that on October 8, 2005 (the "Petition Date") Delphi Corporation and its United States subsidiaries and affiliates (collectively "Delphi") filed voluntary petitions commencing cases under Chapter 11 of Title 11 of the United States Code ("the Bankruptcy Code"). Within ten (10) days preceding the Petition Date, Gibbs delivered goods and supplies (the "Goods") to Delphi. These Goods were sold to Delphi on credit and received by Delphi at a time when we now believe Delphi was insolvent.

Demand is hereby made on behalf of Delphi pursuant to § 546(c) of the Bankruptcy Code and Section 2-702 of the Uniform Commercial Code, and/or other applicable law, for the return of the Goods received by Delphi during the ten (10) days preceding the Petition Date, and identified in the summary attached hereto as composite Exhibit A, for which payment has not been made.

This letter serves as notice to Delphi that Gibbs hereby asserts its demand to reclaim the aforementioned Goods.

Sincerely,

Michael K. McCrory

MKM/wdb

cc: William Baxter, Gibbs Die Casting Corporation

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**Goods Shipped within 10 Days of Petition Date**

**Goods Shipped within 10 Days of Petition Date**

Delphi Shipments										Qty				Price		Total	Ran #	
Inv No	Inv Date	Customer	Cust Id	Shipper #	Period	Pur Order #	Line No	Cust Part	Part Desc									
28487	10/4/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316603	200510	550000164		2	22145682 ENGINE MOUNT				1,385.00	1.7673		\$2,447.71		
28487	10/4/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316603	200510	550000164		3	22179311 MOUNT BRACKET				1,884.00	2.309		\$3,888.36		
28491	10/4/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316611	200510	550015996		1	22177081 BODY				3,929.00	3.0025		\$11,796.82		
28492	10/4/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316611	200510	550024380		1	22206170 BODY				1,602.00	1.6966		\$2,717.95		
28492	10/4/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316611	200510	550024380		2	22222400 BODY				4,642.00	1.615		\$7,496.83		
28492	10/4/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316611	200510	550024380		3	22222402 BODY				4,646.00	0.776		\$3,605.30		
28596	10/5/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316665	200510	550000164		1	22145626 ENGINE MOUNT				993	1.6968		\$1,684.92		
28596	10/5/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316665	200510	550000164		2	22145682 ENGINE MOUNT				1,826.00	1.7673		\$3,227.09		
28596	10/5/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316665	200510	550000164		3	22179311 MOUNT BRACKET				1,706.00	2.309		\$3,939.15		
28845	10/7/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316775	200510	550000164		1	22145682 ENGINE MOUNT				1,574.00	1.7673		\$2,781.73		
28845	10/7/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316775	200510	550000164		2	22179311 MOUNT BRACKET				1,550.00	2.309		\$3,578.95		
28846	10/7/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316776	200510	550015996		1	22173976 BODY				656	3.0025		\$1,969.64		
28846	10/7/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316776	200510	550015996		2	22177081 BODY				2,596.00	3.0025		\$7,794.49		
28847	10/7/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316776	200510	550024380		1	22222400 BODY				4,389.00	1.615		\$7,088.24		
28847	10/7/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316776	200510	550024380		2	22222402 BODY				9,279.00	0.776		\$7,200.50		
28705	10/6/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316720	200510	550000164		1	22145626 ENGINE MOUNT				615	1.6968		\$1,043.53		
28705	10/6/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316720	200510	550000164		2	22145682 ENGINE MOUNT				1,507.00	1.7673		\$2,663.32		
28705	10/6/2005	DELPHI ENERGY & CHASSIS SYSTE	1043	316720	200510	550000164		3	22179311 MOUNT BRACKET				1,736.00	2.309		\$4,008.42		
1950	9/26/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1379	200509	550066134		1	16898653 ARMATURE, NF/CM				1,178.00	7.999		\$9,422.82		
1953	9/27/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1382	200509	550065211		1	16821921 ARMATURE, UW				164	5.4814		\$898.95		
1954	9/27/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1382	200509	550066134		1	16898653 ARMATURE, NF/CM				1,338.00	7.999		\$10,702.66		
1958	9/28/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1384	200509	550066134		1	16898653 ARMATURE, NF/CM				987	7.999		\$7,895.01		
1962	9/29/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1389	200509	550065211		1	16821921 ARMATURE, UW				160	5.4814		\$877.02		
1963	9/29/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1389	200509	550066134		1	16898653 ARMATURE, NF/CM				1,163.00	7.999		\$9,302.84		
1969	9/30/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1393	200509	550065211		1	16821921 ARMATURE, UW				166	5.4814		\$909.91		
1970	9/30/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1393	200509	550066134		1	16898653 ARMATURE, NF/CM				1,006.00	7.999		\$8,046.99		
1971	10/3/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1398	200510	550066134		1	16898653 ARMATURE, NF/CM				1,003.00	7.999		\$8,023.00		
1982	10/7/2005	DELPHI INT & LIGHTING SYSTEMS	1008	1408	200510	550066134		1	16898653 ARMATURE, NF/CM				1,001.00	7.999		\$8,007.00		
																\$364,921.66		

Goods Shipped within 10 Days of Petition Date